

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PAUL M. DAUGERDAS, ERWIN MAYER,
DONNA GUERIN, DENIS FIELD,
RAYMOND CRAIG BRUBAKER, and
DAVID PARSE,

Defendants.

S1 09-cr-581 (WHP)

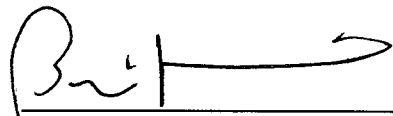
FILED
U.S. DISTRICT COURT
2010 JUN 24 AM 11:58
S.D. OF N.Y.

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

PLEASE TAKE NOTICE that upon the accompanying Declaration of Brian J. Fischer, Esq., Brian J. Fischer respectfully moves the Court, pursuant to Local Civil Rule 1.3(c), for an Order admitting Nicole A. Allen, Esq. to the Bar of this Court as counsel for defendant Paul M. Daugerdas *pro hac vice* for the pendency of the above-captioned case or until further order of this Court. A proposed order is submitted with this motion.

PLEASE TAKE FURTHER NOTICE that the undersigned requests that this Court determine the motion on submission and without oral argument under Rule 78 of the Federal Rules of Civil Procedure.

Dated: June , 2010
New York, New York



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910 818-9073 JUN 24 2010

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**DECLARATION OF BRIAN J. FISCHER IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

Brian J. Fischer declares as follows:

1. I am a member in good standing of the Bar of the State of New York and this Court.
2. I am a member of the law firm of Jenner & Block LLP, attorneys for defendant Paul M. Daugerdas ("Mr. Daugerdas") in the above-captioned matter. I submit this Declaration in support of the motion of Mr. Daugerdas pursuant to Local Civil Rule 1.3(c) for the admission of Nicole A. Allen, Esq. to the Bar of this Court *pro hac vice*.
3. Ms. Allen is an associate in the law firm of Jenner & Block LLP, which has offices at 353 North Clark Street, Chicago, IL 60654 telephone number 312.222.9350, facsimile number 312.527.0484, email address nallen@jenner.com. She is a member in good standing of the Bar of Illinois as evidenced by a Certificate of Good Standing attached hereto as Exhibit A. Ms. Allen is admitted to practice before the United States District Court for the Southern District of Illinois and the United States District Court for the Northern District of Illinois.

4. Ms. Allen has advised me that she is familiar with the Federal Rules of Civil Procedure and with the Local Civil Rules of this Court.

5. There are no disciplinary proceedings currently pending against Ms. Allen in any state or federal court.

6. I believe that Ms. Allen will conduct herself in the manner required of attorneys that practice in and are admitted to this Court. I also believe that Ms. Allen's admission *pro hac vice* will serve Mr. Daugerdas's interest and will facilitate the efficient litigation of this matter. Therefore, I respectfully request that Ms. Allen be allowed to practice *pro hac vice* for the purposes of representing Mr. Daugerdas during the pendency of this action or until further order of the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June , 2010
New York, New York



Brian J. Fischer

EXHIBIT A

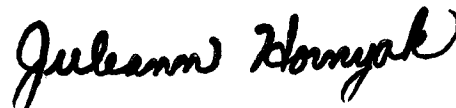
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Nicole Amie Allen

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 2008 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Wednesday, June 23, 2010.



Clerk

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[PROPOSED] ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE*

The motion for admission of counsel *pro hac vice* in this matter having come before and having been considered by the Court, and the Court being satisfied that Nicole A. Allen, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of Illinois, it is hereby

ORDERED that the Motion for Admission *Pro Hac Vice* of Nicole A. Allen, Esq. is GRANTED and Nicole A. Allen is admitted to the Bar of this Court *pro hac vice* as counsel for defendant Paul M. Daugerdas in this matter.

Date: _____, 2010

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Brian J. Fischer, an attorney, hereby certify that on this day of June, 2010, I caused true and correct copies of the foregoing *Notice of Motion for Admission Pro Hac Vice for Nicole A. Allen, Esq., Declaration of Brian J. Fischer in Support of Motion for Admission Pro Hac Vice* and *[Proposed] Order Granting Admission Pro Hac Vice* to be served on the following individuals by email and U.S. mail:

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Brian J. Fischer